

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

COREY ROSENDARY,

DEFENDANT.

CRIMINAL NO.: 03-29 Erie

TYPE OF PLEADING:

10 MOTION TO CONTINUE
11 HEARING

FILED ON BEHALF OF:

COREY ROSENDARY

DEFENDANT

ATTORNEY OF RECORD:

ADAM B. COGAN, ESQUIRE

PA I.D. NO.: 75654

ONE NORTHGATE SQUARE

GREENSBURG, PA 15601

[724] 837-9046

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	
)	
VS.)	CRIMINAL NO.: 03-29 Erie
)	
COREY ROSENDARY,)	
)	
DEFENDANT.)	
)	

MOTION TO CONTINUE HEARING

AND NOW, comes the Defendant, COREY ROSENDARY, by counsel, ADAM B. COGAN, ESQUIRE, and respectfully requests that this Honorable Court continue the evidentiary hearing set in this matter for February 16, 2007. In support thereof, the following is averred:

1. Undersigned counsel was appointed to represent the Defendant in connection with his pending Motion to Vacate his sentence on or about December 22, 2006.
2. Since the time of that appointment, undersigned counsel has endeavored to investigate this matter so as to properly represent the Defendant in connection with this matter. Despite counsel's best efforts, however, it is believed and therefore averred that additional time is necessary in order to allow counsel to properly investigate this matter and prepare for an evidentiary hearing.
3. Undersigned counsel needs an additional 45 days, that is, until on or about April 2, 2007, in order to properly prepare to litigate this matter.

4. Undersigned counsel has communicated with Assistant United States Attorney Marshall Piccinini regarding this matter and Assistant United States Attorney Piccinini has indicated he has no objection to the continuance of the evidentiary hearing so as to allow counsel sufficient time to prepare.

WHEREFORE, it is respectfully requested that an Order enter continuing the evidentiary hearing from February 16, 2007, until on or after April 2, 2007.

RESPECTFULLY REQUESTED,

s/Adam B. Cogan,
ADAM B. COGAN, ESQUIRE
PA I.D. NO.: 75654

ATTORNEY FOR THE DEFENDANT